

VANDERSLICE DECL. EXHIBIT A13

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

DECLARATION OF ADAM MEHES

Adam Mehes declares and states as follows:

1. I am an employee of non-party X Corp. I have personal knowledge of the facts set forth in this declaration and could testify competently as to the matters set forth in this declaration.

2. Based on my personal knowledge and on information provided to me by others at X Corp., I understand that the parties to the above-captioned litigation have submitted to the Court certain information that X Corp. has designated as Confidential or Highly Confidential under the Stipulated Protective Order dated July 11, 2022. Specifically, portions of the July 7, 2023 Expert Report of Michael A. Williams, Ph.D., and the September 15, 2023 Expert Reply Report of Michael A. Williams, Ph.D., refer to these materials.

3. X Corp. believes that good cause and compelling reasons exist to keep the following X Corp.-related portions of the Expert and Reply Report under seal:

Document	Portion to Remain Under Seal
Expert Report of Michael A. Williams Ph.D. p. 21, portion of footnote 55.	From "A Twitter document" to the end of the sentence.

Expert Report of Michael A. Williams Ph.D. p. 28, ¶ 57	From "In a 2019 presentation" to the end of page including the entirety of footnote 82.
Expert Report of Michael A. Williams Ph.D. p. 29, ¶¶ 57-59	From start of the page "Facebook, Instagram" to the end of the paragraph 59 and including footnotes 83-87.
Expert Report of Michael A. Williams Ph.D. p. 30, ¶ 63.	From "Twitter also" to end of the sentence and including footnote 92.
Expert Report of Michael A. Williams Ph.D. p. 41, ¶¶ 89-90.	From "Other industry" to the end of the sentence ending in "directly with consumers" and including entirety of footnotes 131 and 132.
Expert Report of Michael A. Williams Ph.D. p. 43, ¶ 95.	From "That social" to the end of the sentence and including the portion of footnote 139 starting with "DX 0812."
Expert Report of Michael A. Williams Ph.D. p. 65, ¶ 155.	From "Both Twitter" to the end of the paragraph and including footnotes 219 and 220.
Expert Report of Michael A. Williams Ph.D. p. 107, ¶ 239.	From "According to a July 2014 Twitter spreadsheet" to the end of the paragraph and including footnote 364.
Expert Report of Michael A. Williams Ph.D. p. 108, ¶ 242.	From " A Twitter presentation" to the end of the paragraph and including footnote 371.
Expert Report of Michael A. Williams Ph.D. pp. 110-111, ¶ 247.	From "A 2019 Twitter document" to the end of the paragraph, Figure 20, and the entirety of footnotes 380-382.
Expert Report of Michael A. Williams Ph.D. p. 155, ¶ 321.	From "Discussing its" to the end of the paragraph and including the entirety of footnote 545.
Expert Reply Report of Michael A. Williams Ph.D. p. 16, Table 1	From " A July 2014" to the end of the row at "00002394."
Expert Reply Report of Michael A. Williams Ph.D. p. 17, Table 1	From "In a 2017 internal" to the end of the row at "00023144."
Expert Reply Report of Michael A. Williams Ph.D. p. 18, Table 1	From "A Twitter Core" to the end of the row at "000582289."
Expert Reply Report of Michael A. Williams Ph.D. p. 18, Table 1	From "In a November 2019" to the end of the row at "00058347." From "An internal Twitter report" to the end of the row "00048858-862."
Expert Reply Report of Michael A. Williams Ph.D. p. 22, ¶ iv.	From " In discussing antitrust" to the end of the paragraph and including footnote 40.

4. The above-referenced material reflects non-public market and/or product feature analysis, privacy information, and other confidential information belonging to X Corp. This information is highly sensitive, and X Corp. takes very seriously the need to keep such information confidential. X Corp. believes that the disclosure of this information would be competitively damaging to X Corp. because, among other reasons, it would give confidential information about X Corp. and its market and product feature analysis to X Corp.'s competitors. This information is also potentially damaging to X Corp. employees.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on:

16 November 2023

DocuSigned by:

Adam Mehes

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Adam Mehes
Senior Director, Legal, X Corp.